

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**VERONICA VENZANT, Individually
and as Next Friend of M.E. (minor),
*Plaintiffs,***

VS.

**BIGELOW ARIZONA TX-282 LP d/b/a
BUDGET SUITES OF AMERICA and
BIGELOW ARIZONA
CORPORATION,
*Defendants.***

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CIVIL ACTION NO. 3:22-cv-02600-X

JOINT MOTION FOR ENTRY OF AGREED TAKE-NOTHING JUDGMENT

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES, Plaintiff, Veronica Venzant, Individually and as Next Friend of M.E. (minor), and Defendants, Bigelow Arizona TX-282 LP d/b/a Budget Suites of America and Bigelow Arizona Corporation, in the above entitled and numbered cause, and respectfully file this, Joint Motion for Entry of Agreed Take-Nothing Judgment, and for same would respectfully show the following:

I.

Plaintiff, Veronica Venzant, Individually and as Next Friend of M.E. (minor), and Defendants, Bigelow Arizona TX-282 LP d/b/a Budget Suites of America and Bigelow Arizona Corporation have entered into an Unconditional Release, Lien Satisfaction, Indemnity, Assignment, and Confidentiality Agreement settling all claims asserted in this cause of action. The terms of the Unconditional Release, Lien Satisfaction, Indemnity, Assignment, and Confidentiality Agreement have been satisfied and are confidential. Plaintiff and Defendants jointly request that this Court enter the attached Agreed Take-Nothing Judgment dismissing all


claims and causes of action asserted against Defendants Bigelow Arizona TX-282 LP d/b/a Budget Suites of America and Bigelow Arizona Corporation, with prejudice to Plaintiff's right to re-file said claims and causes of action in any other court.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiff, Veronica Venzant, Individually and as Next Friend of M.E. (minor), together with Defendants, Bigelow Arizona TX-282 LP d/b/a Budget Suites of America and Bigelow Arizona Corporation, respectfully pray that the relief requested in this Joint Motion for Entry of Agreed Take-Nothing Judgment be in all things granted, and for all such other and further relief, whether general or special, both at law or in equity, to which the parties may be justly entitled.

Respectfully submitted,

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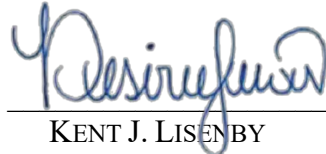
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BIGELOW ARIZONA TX-282 LP D/B/A
BUDGET SUITES OF AMERICA AND
BIGELOW ARIZONA CORPORATION

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing Joint Motion for Agreed Take Nothing Judgment has been sent to all known counsel via eServe, email and/or facsimile, on August __, 2024, addressed as follows:

Kent J. Lisenby
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